

1 DAN M. WINDER, ESQ.  
2 Nevada State Bar No. 1569  
3 ARNOLD WEINSTOCK  
4 Nevada State Bar No. 810  
5 SCOTT C. DORMAN, ESQ.  
6 Nevada State Bar No. 13108  
7 LAW OFFICE OF DAN M. WINDER, P.C.  
3507 W. Charleston Blvd.  
Las Vegas, NV 89102  
Telephone: (702) 474-0523  
Facsimile: (702) 474-0631  
winderdanatty@aol.com  
*Attorneys for Plaintiff*

8  
9  
10  
11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 PATRICIA KENNEDY, an individual,

Case No: 2:14-cv-01678-RFB-(PAL)

14 Plaintiff,

15 vs.

16 UNIVERSITY MEDICAL CENTER a.k.a.  
17 UNIVERSITY MEDICAL CENTER OF  
18 SOUTHERN NEVADA a.k.a. UMC, a  
19 political subdivision of Nevada; DOUG  
20 SPRING, in his official capacity as Director of  
Human Resources at UMC; GLEN  
21 MACINTYRE, individually and in his official  
capacity as Director of Risk Management at  
UMC; STEVE WINKLE, individually and in  
22 his official capacity as Licensed Clinical Social  
Worker at UMC; DOES I-V; ROES VI-X,

23  
24 **STIPULATION AND ORDER  
REGARDING RESPONSE TO SUMMARY  
JUDGMENT MOTION**

25  
26  
27 Defendants.

Plaintiff Patricia Kennedy, by and through her attorney, Dan M. Winder, Esq. of the Law

1 Office of Dan M. Winder, P.C., and Defendants University Medical Center, Doug Spring, Glen  
2 MacIntyre, Steve Winkle, by and through their attorney, Jeffrey I. Pitegoff, Esq., hereby stipulate  
3 and agree:

- 4 1. The deadline for the Plaintiff's response to the Defendants' motion for summary  
5 judgment (DKT. 50) is hereby extended to March 4, 2016.
- 6 2. The deadline for the Defendant's reply to the Plaintiff's response to the Defendants'  
7 motion for summary judgment is hereby extended a corresponding 4 days.

8  
9 The above stipulation is based on the following:

- 10 1. Defendant filed a motion for summary judgment on February 5, 2016.
- 11 2. This is the first request for an extension of time to respond to these motions.
- 12 3. That the Plaintiff and Defendant have stipulated that an extension is in order.
- 13 4. That the Defendant's motion for Summary Judgment is voluminous. It is 31 pages long.
- 14 5. That the Plaintiff's attorney, Mr. Dan M. Winder, Esq., has a personal emergency that is  
15 requiring his attention to wit: 1) his widowed aunt suffered a fall with brain injury, 2) she has  
16 been hospitalized and is now at a hospice, 3) she has been removed from all life support and  
17 feeding tubes, 4) and the family is awaiting her death, 5) because his aunt had no children and  
18 was widowed, Mr. Winder has taken on a primary role during this process to her death. Mr.  
19 Winder's attentions have been required on dealing with his aunt's circumstances over the past 15  
20 days, which has prevented him from giving this answer it full attention.
- 21 6. That Mr. Winder, and his office, is scheduled for trial in State court in the case of State of  
22 Nevada vs. Robert Sharpe III (a copy of the docket is attached), said trial to begin on Tuesday  
23 the 1<sup>st</sup> of March, 2016. That Mr. Winder is court appointed in that matter and must take the lead

1 role in defending the matter. That Mr. Winder's client is facing 16 felony charges with a  
2 maximum penalty of life without parole. That Mr. Winder, when not attending to his aunt's  
3 matters, expects to be consumed with preparation of this weighty state matter.

4 10. This is a good faith request made not for the purpose of delay.  
5

6 Accordingly, Plaintiff requests that time to respond the Motions for Summary Judgment #50 be  
7 extended to the 4<sup>th</sup> day of March, 2016, and the Defendant's reply be extended a corresponding 4  
8 days.  
9

10 DATED this 26th day of February, 2016

11 LAW OFFICE OF DAN M. WINDER, P.C.

12  
13 By: /s/ Scott C. Dorman  
14 DAN M. WINDER, ESQ.  
Nevada Bar No. 1569  
15 SCOTT C. DORMAN, ESQ.  
Nevada Bar No. 13108  
3507 W Charleston  
16 Las Vegas, Nevada 89118  
Telephone: (702) 474-0523  
17 *Attorneys for Plaintiff*

DATED this 26th day of February, 2016

MORRIS, SULLIVAN, LEMKUL &  
PITEGOFF

By: /s/ Jeffrey I. Pitegoff  
JEFFREY I. PITEGOFF, ESQ.  
Nevada Bar No. 5458  
DANIEL S. CEREGHINO, ESQ.  
Nevada Bar No. 11534  
3770 Howard Hughes Parkway, Suite 170  
Las Vegas, Nevada 89169  
Telephone: (702) 405-8100  
*Attorney for Defendants*

18  
19  
20 IT IS SO ORDERED this 2nd day of March, 2016.  
21  
22



23  
24 RICHARD F. BOULWARE, II  
United States District Judge  
25  
26  
27  
28

1

2 **CERTIFICATE OF SERVICE**

3

4 Pursuant to LR 5-1, I hereby certify that I am an employee of the LAW OFFICE OF  
5 DAN M. WINDER, P.C., and that on the \_\_\_\_\_ th day of \_\_\_\_\_, 2016, I served the  
6 foregoing **STIPULATION AND ORDER REGARDING THE DEADLINES FOR**  
**RESPONSE AND REPLY TO THE DEFENDANT'S MOTION FOR SUMMARY**  
7 **JUDGMENT** as follows:

8

9 E-Service pursuant to LR 5-4:

10

11 Jeffrey I. Pitegoff, Esq.  
12 Nevada State Bar No. 5458  
13 Daniel S. Cereghino, Esq.  
14 Nevada State Bar No. 11534  
15 MORRIS, SULLIVAN, LEMKUL & PITEGOFF  
16 3770 Howard Hughes Parkway, Suite 170  
17 Las Vegas, Nevada 89169  
18 Tel: (702) 405-8100; Fax: (702) 405-8101  
19 pitegoff@morrissullivanlaw.com

20 *Attorney for Defendants University Medical Center,  
21 Doug Spring, Glen MacIntyre, and Steve Winkle*

22

23 Employee of the Law Office of Dan M. Winder P.C.

24

25

26

27

28

## REGISTER OF ACTIONS

CASE No. C-14-301364-1

**State of Nevada vs Robert Sharpe, III**

§ Case Type: **Felony/Gross Misdemeanor**  
§ Date Filed: **10/03/2014**  
§ Location: **Department 2**  
Cross-Reference Case Number: **C301364**  
Defendant's Scope ID #: **1963406**  
Grand Jury Case Number: **13BGJ160**  
ITAG Case ID: **1635222**

**RELATED CASE INFORMATION**

## Related Cases

C-14-301364-2 (Multi-Defendant Case)

**PARTY INFORMATION**

**Defendant** **Sharpe, Robert, III**  
2502 SPANISH FORK  
NORTH LAS VEGAS, NV 89031  
SID: NV1963406  
Other Agency Numbers  
1963406 Justice Court Scope ID Subject  
Identifier, XJ90C1BE XID Subject Identifier,  
1963406 Scope ID Subject Identifier

Male  
5' 8", 160 lbs

**Lead Attorneys**  
**Arnold Weinstock, ESQ**  
*Retained*  
702-474-0631(W)

**Plaintiff**      **State of Nevada**      **Steven B Wolfson**  
702-671-2700(W)

**CHARGE INFORMATION**

Charges: Sharpe, Robert, III	Statute	Level	Date
1. CONSPIRACY TO COMMIT SEX TRAFFICKING	201.300.2	Felony	03/01/2014
2. SEX TRAFFICKING	201.300.2	Felony	03/01/2014
3. LIVING FROM THE EARNINGS OF A PROSTITUTE	201.320	Felony	03/01/2014
4. CONSPIRACY TO COMMIT KIDNAPPING	200.310.1	Felony	03/01/2014
6. FIRST DEGREE KIDNAPPING WITH USE OF A DEADLY WEAPON RESULTING IN SUBSTANTIAL BODILY HARM	200.310.1	Felony	03/01/2014
6. BATTERY WITH USE OF A DEADLY WEAPON RESULTING IN SUBSTANTIAL BODILY HARM	200.481.2e2	Felony	03/01/2014
7. BATTERY WITH USE OF A DEADLY WEAPON	200.481.2e1	Felony	03/14/2014
8. BATTERY WITH USE OF A DEADLY WEAPON REULTING IN SUBSTANTIAL BODILY HARM	200.481.2e2	Felony	03/01/2014
9. BATTERY WITH USE OF A DEADLY WEAPON RESULTING IN SUBSTANTIAL BODILY HARM	200.481.2e2	Felony	03/01/2014
10. BATTERY BY STRANGULATION	200.481.2b	Felony	03/01/2014
11. FIRST DEGREE KIDNAPPING	200.310.1	Felony	03/01/2014
11. ASSAULT WITH USE OF A DEADLY WEAPON	200.471.2b	Felony	03/01/2014
12. MAYHEM WITH USE OF A DEADLY WEAPON	200.280	Felony	03/01/2014
13. INVOLUNTARY SERVITUDE WITH SUBSTANTIAL BODILY HARM	200.463.2a	Felony	03/01/2014
14. FIRST DEGREE KIDNAPPING RESULTING IN SUBSTANTIAL BODILY HARM WITH USE OF A DEADLY WEAPON	200.310.1	Felony	03/01/2014
15. CONSPIRACY TO PREVENT OR DISSUADE A WITNESS OR VICTIM FROM REPORTING A CRIME OR COMMENCING PROSECUTI	199.480.3	Gross Misdemeanor	03/01/2014
16. PREVENTING OR DISSUADING WITNESS OR VICTIM FROM REPORTING CRIME OR COMMENCING PROSECUTION	199.305	Felony	03/01/2014
17. CONSPIRACY TO PREVENT OR DISSUADE A WITNESS OR VICTIM FROM REPORTING A CRIME OR COMMENCING *...*	199.480.3	Gross Misdemeanor	03/01/2014
18. PREVENTING OR DISSUADING WITNESS OR VICTIM FROM REPORTING CRIME OR COMMENCING PROSECUTION	199.305	Felony	03/01/2014

**EVENTS & ORDERS OF THE COURT**

## DISPOSITIONS

01/22/2015 (Judicial Officer: Silver, Abbi)  
11 FIRST DEGREE KIDNAPPING

	Dismissed
01/22/2015	(Judicial Officer: Silver, Abbi) 6. FIRST DEGREE KIDNAPPING WITH USE OF A DEADLY WEAPON RESULTING IN SUBSTANTIAL BODILY HARM Dismissed
02/04/2015	(Judicial Officer: Silver, Abbi) 17. CONSPIRACY TO PREVENT OR DISSUADE A WITNESS OR VICTIM FROM REPORTING A CRIME OR COMMENCING *...* Amended Information Filed/Charges Not Addressed 18. PREVENTING OR DISSUADE WITNESS OR VICTIM FROM REPORTING CRIME OR COMMENCING PROSECUTION Amended Information Filed/Charges Not Addressed
	<b>OTHER EVENTS AND HEARINGS</b>
10/03/2014	<u>Indictment</u> <i>Indictment</i>
10/03/2014	<u>Warrant</u> <i>Indictment Warrant</i>
10/03/2014	<u>Indictment Warrant Return</u> (11:45 AM) (Judicial Officer Togliatti, Jennifer) <u>Parties Present</u> <u>Minutes</u> Result: Matter Heard
10/06/2014	<u>Indictment Warrant Return</u>
10/08/2014	<u>Media Request and Order</u> <i>Media Request And Order Allowing Camera Access To Court Proceedings</i>
10/09/2014	<u>Initial Arraignment</u> (9:00 AM) (Judicial Officer Silver, Abbi)
10/09/2014	<u>Indictment Warrant Return</u> (9:00 AM) (Judicial Officer Silver, Abbi)
10/09/2014	<u>All Pending Motions</u> (9:00 AM) (Judicial Officer Silver, Abbi) <u>Parties Present</u> <u>Minutes</u> Result: Plea Entered
10/13/2014	<u>Media Request and Order</u> <i>Media Request And Order Allowing Camera Access To Court Proceedings</i>
10/14/2014	<u>Motion</u> <i>Motion for Setting of Reasonable Bail</i>
10/17/2014	<u>Transcript of Proceedings</u> <i>Reporter's Transcript of Proceedings, Grand Jury Hearing, October 2, 2014</i>
10/21/2014	<u>Motion for Own Recognition Release/Setting Reasonable Bail</u> (9:00 AM) (Judicial Officer Silver, Abbi) <u>Defendant's Motion for Setting of Reasonable Bail</u> <u>Parties Present</u> <u>Minutes</u> Result: Denied
10/21/2014	<u>Opposition</u> <i>State's Opposition to Defendant's Motion For The Setting Or Reasonable Bail Filed Under Seal</i>
10/23/2014	<u>Media Request and Order</u> <i>Media Request And Order Allowing Camera Access To Court Proceedings</i>
10/23/2014	<u>Media Request and Order</u> <i>Media Request And Order Allowing Camera Access To Court Proceedings</i>
10/28/2014	<u>Stipulation and Order</u> <i>Stipulation and Order for Extention of Deadline to File PreTrial Writ of Habeas Corpus</i>
11/07/2014	<u>Petition</u> <i>Petition for Writ of Habeas Corpus</i>
11/19/2014	<u>Order</u> <i>Order</i>
11/20/2014	<u>Return</u> <i>State's Return to Writ of Habeas Corpus</i>
11/21/2014	<u>Writ</u> <i>Writ of Habeas Corpus</i>
01/15/2015	<u>Notice of Witnesses and/or Expert Witnesses</u> <i>Notice of Witnesses and/or Expert Witnesses</i>
01/16/2015	<u>Reply</u> <i>Defendant's Reply to the State's Return to the Writ of Habeas Corpus</i>
01/16/2015	<u>Reply</u> <i>Defendant's Reply to the State's Return to the Writ of Habeas Corpus</i>
01/22/2015	<u>Petition for Writ of Habeas Corpus</u> (9:00 AM) (Judicial Officer Ames, Jack B.) <u>Parties Present</u> <u>Minutes</u> 01/20/2015 Reset by Court to 01/22/2015 Result: Granted in Part
01/27/2015	<u>Notice of Motion</u> <i>Notice of Motion and Motion to Prohibit Disclosure of Victim's Address</i>
02/04/2015	<u>Amended Indictment</u> <i>Amended Indictment</i>
02/13/2015	<u>Opposition</u> <i>Defendant's Opposition to State's Motion to Prohibit Disclosure of Victim's Address</i>
02/17/2015	<u>Motion</u> (9:00 AM) (Judicial Officer Bonaventure, Joseph T.) 02/17/2015, 02/19/2015, 04/02/2015, 04/09/2015, 05/21/2015 <i>Notice of Motion and Motion to Prohibit Disclosure of Victim's Address</i>

	<u>Parties Present</u>
	<u>Minutes</u>
	04/30/2015 Reset by Court to 05/21/2015
	Result: Continued
02/19/2015	<b>Calendar Call</b> (9:00 AM) (Judicial Officer Bonaventure, Joseph T.)
	Result: Set Status Check
02/19/2015	<b>Status Check</b> (9:00 AM) (Judicial Officer Bonaventure, Joseph T.) 02/19/2015, 04/02/2015, 04/09/2015 Status Check: New Counsel
	Result: Continued
02/19/2015	<b>All Pending Motions</b> (9:00 AM) (Judicial Officer Bonaventure, Joseph T.)
	<u>Parties Present</u>
	<u>Minutes</u>
	Result: Matter Heard
02/20/2015	<b>Media Request and Order</b> Media Request And Order Allowing Camera Access To Court Proceedings
02/23/2015	<b>CANCELED Jury Trial</b> (9:00 AM) (Judicial Officer Silver, Abbi) Vacated - per Judge
03/31/2015	<b>Reply</b> State's Reply to Defendant's Opposition to State's Motion to Prohibit Disclosure of Victim's Address
04/02/2015	<b>Status Check</b> (9:00 AM) (Judicial Officer Bonaventure, Joseph T.) 04/02/2015, 04/09/2015 Status Check: Resetting Trial
	Result: Continued
04/02/2015	<b>All Pending Motions</b> (9:00 AM) (Judicial Officer Bonaventure, Joseph T.) Status Check: Resetting Trial, Status Check: New Counsel and Notice of Motion and Motion to Prohibit Disclosure of Victim's Address
	<u>Parties Present</u>
	<u>Minutes</u>
	Result: Continued
04/09/2015	<b>All Pending Motions</b> (9:00 AM) (Judicial Officer Bonaventure, Joseph T.) Status Check: Resetting Trial, Status Check: New Counsel and Notice of Motion and Motion to Prohibit Disclosure of Victim's Address
	<u>Parties Present</u>
	<u>Minutes</u>
	Result: Decision Made
04/13/2015	<b>Substitution of Attorney</b> Substitution Attorneys
05/04/2015	<b>Case Reassigned to Department 2</b> Case reassigned from Judge Abbi Silver Dept 15
08/18/2015	<b>Motion</b> Motion to Withdraw as Counsel of Record
08/26/2015	<b>Receipt of Copy</b> Receipt of Copy
09/01/2015	<b>Motion to Withdraw as Counsel</b> (9:00 AM) (Judicial Officer Scotti, Richard F.) Dan M Winder's Motion to Withdraw as Counsel of Record
	<u>Parties Present</u>
	<u>Minutes</u>
	Result: Motion Granted
09/10/2015	<b>Media Request and Order</b> Media Request And Order Allowing Camera Access To Court Proceedings
09/17/2015	<b>CANCELED Calendar Call</b> (8:30 AM) (Judicial Officer Scotti, Richard F.) Vacated - per Judge
09/17/2015	<b>Order to Withdraw as Attorney of Record</b> Order
09/21/2015	<b>CANCELED Jury Trial</b> (10:00 AM) (Judicial Officer Scotti, Richard F.) Vacated - per Judge
09/29/2015	<b>Status Check</b> (9:00 AM) (Judicial Officer Scotti, Richard F.) 09/29/2015, 10/08/2015 Status Check: Counsel
	<u>Parties Present</u>
	Result: Matter Continued
09/29/2015	<b>Trial Setting</b> (9:00 AM) (Judicial Officer Scotti, Richard F.) 09/29/2015, 10/08/2015
	<u>Parties Present</u>
	Result: Matter Continued
09/29/2015	<b>All Pending Motions</b> (9:00 AM) (Judicial Officer Scotti, Richard F.)
	<u>Parties Present</u>
	<u>Minutes</u>
	Result: Matter Heard
10/08/2015	<b>All Pending Motions</b> (9:00 AM) (Judicial Officer Scotti, Richard F.)
	<u>Parties Present</u>
	<u>Minutes</u>
	Result: Trial Date Set
10/29/2015	<b>Request</b> (9:00 AM) (Judicial Officer Scotti, Richard F.) State's Request to Address Trial Date
	<u>Parties Present</u>

	<u>Minutes</u> Result: Denied Without Prejudice
11/06/2015	<b>Motion</b> <i>Notice of Motion and Motion for Trial Phase Discovery</i>
11/13/2015	<b>Opposition to Motion</b> <i>State's Opposition to Defendant's Motion for Trial Phase Discovery</i>
11/17/2015	<b>Motion for Discovery</b> (9:00 AM) (Judicial Officer Scotti, Richard F.) <i>Defendant's Notice of Motion and Motion for Trial Phase Discovery</i> <b>Parties Present</b> <u>Minutes</u>
	Result: Granted in Part
01/27/2016	<b>Ex Parte Motion</b> <i>Ex Parte Application to Declare Defendant Indigent</i>
01/28/2016	<b>Supplemental Witness List</b> <i>Supplemental Notice of Witnesses and/or Expert Witnesses</i>
01/29/2016	<b>Supplemental Witness List</b> <i>Second Supplemental Notice of Witnesses and/or Expert Witnesses [NRS 174.234]</i>
02/09/2016	<b>Calendar Call</b> (9:00 AM) (Judicial Officer Scotti, Richard F.) <b>Parties Present</b> <u>Minutes</u> <i>02/11/2016 Reset by Court to 02/09/2016</i>
	Result: Trial Date Set
02/16/2016	<b>CANCELED Jury Trial</b> (10:00 AM) (Judicial Officer Scotti, Richard F.) <i>Vacated</i>
02/16/2016	<b>Notice of Witnesses and/or Expert Witnesses</b> <i>Notice of Defense Witness List</i>
02/18/2016	<b>Receipt of Copy</b> <i>Receipt of Copy</i>
02/19/2016	<b>Notice of Witnesses and/or Expert Witnesses</b> <i>Notice of Expert Witnesses</i>
02/22/2016	<b>Supplemental Witness List</b> <i>Third Supplemental Notice of Witnesses and/or Expert Witnesses</i>
02/23/2016	<b>Status Check</b> (9:00 AM) (Judicial Officer Scotti, Richard F.) <i>02/23/2016, 02/25/2016</i> <i>02/16/2016 Reset by Court to 02/23/2016</i>
02/23/2016	<b>Ex Parte Motion</b> <i>Ex Parte Motion and Order to Compel Appearance of Dr. Jeffrey Lewis, Lt. Col. USAF</i>
02/29/2016	<b>CANCELED Jury Trial</b> (10:00 AM) (Judicial Officer Scotti, Richard F.) <i>Vacated</i>
03/01/2016	<b>Jury Trial - FIRM</b> (11:00 AM) (Judicial Officer Scotti, Richard F.)